CRIMINAL COMPLAINT (Electronically Submitted)

(Modiformount)	
DISTRICT of ARIZONA	
DOCKET NO.	
MAGISTRATE'S CASE NO.	
22-01545MJ	

Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about March 12, 2022, in the District of Arizona, Laurencio Garcia and Gebeil Adrian Romero-Felix, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, including Miguel Angel Ramirez-Jinez, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A), and 1324(a)(1)(A)(v)(I) 1324(a)(1)(B)(i).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about March 12, 2022, in the District of Arizona (Sells), a United States Border Patrol Agent (BPA) BPA working roving patrol along State Route 86 (SR-86) and Federal Route 15 (FR-15) heard an announcement to be on the look out for a Grey Chevy Malibu possibly engaging in smuggling. The BPA spotted two vehicles driving eastbound on SR-86. The first vehicle was dark grey Charger and the second was a 2016 grey Chevrolet Malibu. The BPA ran a record check on the license plate Arizona LNA4YC and the records showed it was for the same Chevy Malibu announced as a be on the lookout for possible smuggling activity. A couple of weeks prior, the Chevy Malibu was working in tandem with a Toyota Camry and the drivers admitted they were going to pick up non-citizens but the drivers were lost and decided to go back to Phoenix. The BPA ran a record check on the 2017 dark grey Dodge Charger with Arizona license plate number CCA2CE. The Dodge Charger is registered out of Glendale, Arizona. The BPA noticed that the Dodge Charger appeared to be weighted down in the rear. The Chevy Malibu passed the Dodge Charger and both vehicles began slowing down 10 miles slower than the posted speed limit. The BPA initiated a vehicle stop on the Dodge Charger and the occupants attempted to bail out. The BPA was able to catch the driver, later identified as Laurencio Garcia, and the seven passengers in the back seat and two people in the trunk, including Miguel Angel Ramirez-Jinez. The BPA was able to determine the nine none-citizens were nationals of Mexico. The BPA did a vehicle stop on the Chevy Malibu. The BPA approached the driver of the Malibu, later identified as Gebeil Adrian Romero-Felix, and asked where he was coming from. Romero-Felix stated he was going to Rocky Point. The BPA asked Romero-Felix why he was traveling Eastbound if he was going to Rocky Point. The BPA asked for permission to search the trunk. The BPA noticed there were tools for construction, but no luggage for a trip.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Miguel Angel Ramirez-Jinez Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA HNS/mh Sworn by telephone x SIGNATURE OF COMPLAINANT US Border Patrol Agent DATE March 14, 2022

See Federal rules of Criminal Procedure Rules 3, 4.1, and 54

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In a post-Miranda statement, Laurencio Garcia said he owns a 2017 grey Dodge Charger. Garcia said he knew that he was going to pick up people to smuggle them into the United State. Garcia said he was going to be paid \$600.00 USD per person. Garcia said he knew that it was illegal to smuggle people into the United States. Garcia said that Gebeil Adrian Romero-Felix knew they were smuggling non-citizens. Garcia said he knew Romero-Felix was getting paid but did not know how much.

In a post-Miranda statement, Gebeil Adrian Romero-Felix said he borrowed the grey Chevrolet Malibu from a friend. Romero-Felix said he was going to Rocky Point when his girlfriend called him to tell him the Lukeville Port of Entry was closed, so he was driving to Nogales, Arizona to meet up with his girlfriend. Romero-Felix stated he was pulled over by Border Patrol near a gas station near Why. Romero-Felix said that he has been arrested by Border Patrol in the past for Human Trafficking.

The material witness, Miguel Angel Ramirez-Jinez admitted to being a citizen of Mexico and that he does not possess any immigration documents that would allow him to enter, pass through, or remain in the United States legally. Ramirez-Juniz said that he made arrangements to be smuggled into the United States for \$20,000 MXN and owed more when he got to his final destination of Ohio. Ramirez-Jinez said he crossed with a group of 8 other people and a black Dodge Chareger picked them up. Ramirez-Jinez said there was only a driver. Ramirez-Jinez was able to identify the driver from a photo-lineup.